

EXHIBIT 3

William D Schultz

From: William D Schultz
Sent: Sunday, May 23, 2010 1:21 AM
To: Strapp, Michael
Cc: Kristin M. Drieman; Daniel McDonald; Kirstin Stoll-DeBell; ML-ePlus Goodwin Service; Craig Merritt; LawsonService; dabney.carr@troutmansanders.com
Subject: RE: ePlus Fifth Notice of 30(b)(6) Deposition

Michael, my email did accurately describe our conversation. Regardless of ePlus's positions related to the relevance of the systems on other issues, we did discuss the fact that Lawson contends the prior systems are relevant for multiple issues. Lawson has voiced its position on multiple occasions. Moreover, I asked you the question whether ePlus would proceed with the depositions if the Judge allowed Lawson's prior systems for issues other than invalidity. You said that ePlus would likely proceed with the depositions if the systems were a part of the case.

We have provided ePlus dates to take depositions of two witnesses based on ePlus's Fifth Notice of 30(b)(6) Deposition. Lawson will provide witnesses on those dates in Washington, D.C. Please confirm whether ePlus plans to proceed with those depositions.

Will

-----Original Message-----

From: Strapp, Michael [mailto:MStrapp@goodwinprocter.com]
Sent: Sat 5/22/2010 10:01 PM
To: William D Schultz
Cc: Kristin M. Drieman; Daniel McDonald; Kirstin Stoll-DeBell; ML-ePlus Goodwin Service; Craig Merritt; LawsonService; dabney.carr@troutmansanders.com
Subject: RE: ePlus Fifth Notice of 30(b)(6) Deposition

Will,

Your email inaccurately characterizes our conversation. We do not agree that the Lawson prior systems are relevant for issues other than invalidity. Indeed, Lawson's argument that it should be permitted to introduce these prior systems for other purposes at trial is a transparent attempt to bring excluded evidence into trial through the back door.

Regards,

Michael

From: William D Schultz [mailto:WSchultz@merchantgould.com]
Sent: Friday, May 21, 2010 4:07 PM
To: Strapp, Michael
Cc: Kristin M. Drieman; Daniel McDonald; Kirstin Stoll-DeBell; ML-ePlus Goodwin Service; Craig Merritt; LawsonService; dabney.carr@troutmansanders.com
Subject: RE: ePlus Fifth Notice of 30(b)(6) Deposition

Michael, we also discussed that the Lawson prior systems are relevant for issues other than invalidity. You stated that ePlus would likely proceed with the deposition if the Judge limited his ruling to the use of the system in relation to invalidity. Let's discuss the schedule again next week after Monday's hearing.

Will

From: Strapp, Michael [mailto:MStrapp@goodwinprocter.com]
Sent: Friday, May 21, 2010 2:52 PM
To: William D Schultz
Cc: Kristin M. Drieman; Daniel McDonald; Kirstin Stoll-DeBell; ML-ePlus
Goodwin Service; Craig Merritt; LawsonService;
dabney.carr@troutmansanders.com
Subject: RE: ePlus Fifth Notice of 30(b)(6) Deposition

Will,

As I mentioned during our conversation, we do not believe that a deposition concerning Lawson Version 6.0 will be necessary as Judge Payne is likely to strike from Lawson's expert report and exclude from trial any reference to the Lawson Version 6.0 software. In the event that Judge Payne does not grant ePlus the relief it seeks with respect to Lawson Version 6.0, we will visit at that time the scheduling issues raised in your email below.

Sincerely,

Michael

From: William D Schultz [mailto:WSchultz@merchantgould.com]
Sent: Friday, May 21, 2010 3:32 PM
To: Strapp, Michael
Cc: Kristin M. Drieman; Daniel McDonald; Kirstin Stoll-DeBell
Subject: ePlus Fifth Notice of 30(b)(6) Deposition

Michael, to confirm our conversation this afternoon, Lawson will designate Jeff Hvass to testify regarding topics 1-8 of ePlus's Fifth Notice of 30(b)(6) deposition on June 4, 2010, in Washington, D.C. Lawson is working on setting up a Lawson Version 6.1 system that would be used in that deposition.

Lawson also designates Richard Lawson with respect to topics 4 and 6 of the Fifth Notice of Deposition. Lawson will make Richard Lawson available on May 28, 2010, in Washington, D.C.

Please confirm that these dates work with ePlus. Thank you.

Will

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